



NEW YORK  
REGIONAL OFFICE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400  
NEW YORK, NY 10281-1022

MEMO ENDORSED

January 27, 2022

By ECF

Hon. Kenneth M. Karas  
United States District Court  
United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,  
12-CV-6421 (KMK)

Dear Judge Karas:

I write on behalf of the United States Securities and Exchange Commission ("Commission") to request that the Court order Defendant Edward Bronson ("Bronson") be taken into custody for failing to make payment as ordered. DE 301, 318.

As background, the Court ordered Bronson to pay the Commission \$1,100,000 by January 13, 2022 and file proof of payment and available funds on ECF or face arrest for his contempt. DE 301. Bronson paid only \$300,000 and filed a notice stating that he "scheduled" an \$800,000 payment for January 21<sup>st</sup> without proof of funds. DEs 301, 310, 311. On January 14, 2022, the Court stayed its Order to incarcerate Bronson until January 19, 2022 at noon. DE 318. The Order states that Bronson "either makes the remainder of the payment he currently owes by noon on January 19, 2022, or he will go to prison." *Id.*

On January 19, 2022, Bronson's counsel informed me that Bronson paid \$800,000 – in two payments, \$700,000 and \$100,000 – and provided information from the pay.gov system. When I followed up and asked if proof would be filed on ECF as required, I received no response. This morning, I learned that the \$700,000 payment was rejected for insufficient funds. Thus, Bronson failed to comply with the Court's Order to pay the \$800,000 outstanding balance on his installment plan by January 19, 2022 at noon. DE 318. So, consistent with the Court's Order, Commission counsel requests that the Court direct the USMS to take Bronson into custody. DE 301, 318.

Respectfully submitted,

*Maureen Peyton King*

Mr. Bronson has been repeatedly warned that failure to comply with the Court's disgorgement orders would result in a finding of contempt and imprisonment. Most recently, the Court ordered that Mr. Bronson make timely payments or face imprisonment. Per this letter from the SEC, it is clear that Mr. Bronson has once again failed to make a timely payment. Accordingly, he is to report to the US Marshals Service in the White Plains courthouse (300 Quarropas Street) by no later than 12 noon so he can be designated to a prison.

So Ordered.

1/27/22